



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

SEP 13 2005

Melissa D.A. Alvarez  
Project Biologist  
US Army Corps of Engineers, NY District  
21<sup>st</sup> Floor, Room 2142  
26 Federal Plaza  
New York, New York 10278-0090

Dear Ms. Alvarez:

The Environmental Protection Agency (EPA) has reviewed the Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI) for the proposed Integrated Ecosystem Restoration Project, located in Jamaica Bay Marsh Islands, Jamaica Bay, New York. The proposed project is intended to restore up to 90 acres of salt marsh regrading sites to appropriate heights by placing fill and planting native coastal plant species. Based on our review of the draft EA, EPA offers the following comments.

The document acknowledges that the US Army Corps of Engineers (USACE) must comply with the General Conformity Regulations (40 CFR Parts 51 and 93) and prepare a thorough air quality analysis including supporting emission calculations. The preliminary, rough analysis that was done and discussed on pages 54 and 125 indicates that project emission levels may be above de minimus and require mitigation, but the potential amounts of pollutants were not specified. Whereas the USACE commits to mitigate for the emissions as necessary, it has not identified potential measures for doing so. An identification of mitigation options would better demonstrate and support the USACE's FONSI.

The Identification of Sediment Sources section (page 64) mentioned Rockaway Inlet and Ambrose Channel as the sources of fill material, with the material being primarily sand. The EA maintains that sand is suitable for marsh restoration, but no references were given. The use of finer organic matter mixed with the dredged material may provide a more suitable medium and increase the likelihood of survival. Furthermore, a phased plan, where fill material is added periodically taking into consideration the dormant and active seasons, would offer a more natural process to the restoration practice. Phasing would also help compliance with General Conformity.

The EA also mentioned an increase of recreational opportunities as a result of the restoration project. You may want to limit water-based and/or land-based activities that could interfere with the restoration and maintenance efforts. Finally, there are several projects and activities planned in the Jamaica Bay area. The potential for cumulative impacts should encourage the coordination of all these activities such that any adverse cumulative impacts are minimized.

Based on our review, we do not anticipate that the implementation of this project as proposed, would result in significant adverse impacts and, therefore, do not object to its implementation. Thank you for the opportunity to comment. Should you have any questions please call Maria Clark, of my staff, at (212) 637-3789.

Sincerely yours,



Grace Musumeci, Chief  
Environmental Review Section  
Strategic Planning and Multi-Media Programs Branch